

# EXHIBIT 120

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

GOVERNMENT OF THE UNITED  
STATES VIRGIN ISLANDS,

Plaintiff,

vs.

Case No.

1:22-cv-10904-JSR

JPMORGAN CHASE BANK, N.A.,

Defendant.

JPMORGAN CHASE BANK, N.A.,

Third-Party  
Plaintiff,

vs.

JAMES EDWARD STALEY,

Third-Party  
Defendant.

Wednesday, April 19, 2023

CONFIDENTIAL - ATTORNEYS' EYES ONLY

Videotaped deposition of Phillip DeLuca, held  
at the offices of Ulmer & Berne, 65 East State Street,  
Columbus, Ohio, commencing at 9:06 a.m., on the above  
date, before Carol A. Kirk, Registered Merit Reporter,  
Certified Shorthand Reporter, and Notary Public.

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877.370.DEPS

deps@golkow.com

1 Q. And then you say, "I hope they do  
2 not cave."

3 What did you mean by that?

4 A. I hope the Private Bank exits the  
5 relationship.

6 MS. OLIVER: We've all signed the  
7 NDA now, right? Has everybody signed  
8 it?

9 Okay.

10 - - -

11 (DeLuca Deposition Exhibit 12 marked.)

12 - - -

13 BY MS. OLIVER:

14 Q. Mr. DeLuca, I'm handing you what  
15 has been marked as Exhibit 12. Take a look at  
16 that.

17 A. Okay.

18 Q. This is an e-mail chain involving  
19 you, Ms. Ryan, and Arthur Middlemiss, correct?

20 A. Yes.

21 Q. Who is Arthur Middlemiss?

22 A. Art was a direct report of mine.

23 Q. Did he have the same -- what was  
24 his job?

1           A.     At this point in time, Art was the  
2     person who was responsible for more of that  
3     proactive work that we were doing.

4           Q.     On human trafficking?

5           A.     On typologies.

6           Q.     So if you could look -- start with  
7     the e-mail that's at the bottom half of that  
8     first page from Ms. Ryan to you with a CC to Art  
9     Middlemiss, "Subject: Jeffrey Epstein."

10                  Do you see that?

11           A.     I do.

12           Q.     And then at the end of the first  
13     paragraph, it says, "It involves an ask of  
14     William, so I'm sending to you first."

15                  William is William Langford?

16           A.     Wait a minute. I'm lost here.

17           Q.     The end of the first paragraph.

18                  MR. KRAUSE: Before you do that,  
19     I have just have a question for you.

20                  At the end of the page, it appears  
21     to end in the middle of a sentence. Is  
22     there -- it's on the back. Thank you.

23     BY MS. OLIVER:

24           Q.     So the end of the first paragraph

1     says, "It involves an ask of William, so I am  
2     sending to you first."

3             A.     Oh, I see that.

4             Q.     William is William Langford there?

5             A.     Yes.

6             Q.     The next paragraph she lists  
7     attendees at the rapid response meeting,  
8     correct?

9             A.     Yes.

10            Q.     Catherine Keating, Anne Verdon.

11                   Do you know who Anne Verdon was?

12            A.     Anne was an attorney for the bank.  
13     I believe she was specifically assigned to the  
14     Private Bank.

15            Q.     The current and former banker, do  
16     you know if that -- do you know who that was?

17            A.     No, I really don't.

18            Q.     Kevin, that's Kevin McCleerey,  
19     right?

20            A.     I believe that's Kevin McCleerey.

21            Q.     Jim is Jim Dalessio?

22            A.     I believe that's Jim Dalessio.

23            Q.     And Bonnie Perry from risk?

24            A.     Yes.

1 Q. And Art -- do you understand that  
2 to be Art Middlemiss?

3 A. Art Middle- -- Art handled the  
4 rapid response meetings.

5 Q. All of them?

6 A. For a period of time.

7 Q. How often were the rapid response  
8 meetings?

9 A. I don't know. There was no set  
10 schedule, that I recall.

11 Q. Were rapid response meetings  
12 unique to Private Bank, or did other segments of  
13 the bank have them?

14 A. They happen for any line of  
15 business.

16 Q. Do you know if Anne Verdon was  
17 general counsel of the Private Bank at this  
18 point in time?

19 A. General counsel of the Private  
20 Bank? I'm not sure if that was a term -- I know  
21 there was a general counsel, and that was  
22 Cutler. But I don't know if -- I don't know if  
23 she was general counsel of Private Bank. I knew  
24 she was affiliated with Private Bank somehow.

1           Q.     Why does Ms. Ryan keep e-mailing  
2     articles if the recommendation had been made  
3     lots and lots of months earlier and still  
4     nothing had been done? Does the  
5     investigation -- does her investigation just  
6     remain ongoing at that point?

7                     MR. KRAUSE: Objection.

8                     MR. GAIL: Objection.

9           A.     You'll have to ask Maryanne that  
10    question.

11          Q.     Well, as a matter of procedure,  
12    I'm trying to understand --

13          A.     That wouldn't be a part of  
14    procedure.

15          Q.     Keeping the investigation open?

16          A.     No.

17                     MR. KRAUSE: Objection.

18          A.     No. Sending e-mails wouldn't be a  
19    part of procedure.

20          Q.     So did you have an understanding  
21    about why she was doing it?

22          A.     Maryanne was all -- as I mentioned  
23    before, Maryanne was all over this, and like  
24    myself and William, Maryanne wanted to see this

1 client gone, the relationship terminated.

2 Q. So was there -- did you or ALM  
3 investigations generally ever receive word, "No,  
4 we are not exiting Mr. Epstein"?

5 MR. KRAUSE: Objection.

6 You can answer.

7 A. I don't know if we ever received  
8 word specific to that.

9 Q. But all this information that  
10 she's e-mailing is part of her ongoing  
11 investigation into Mr. Epstein, correct?

12 MR. KRAUSE: Objection.

13 A. It appears to be.

14 Q. And does there come a point in  
15 time at which she's supposed to stop her  
16 investigation?

17 A. Good luck. Try to tell Maryanne  
18 to stop.

19 - - -

20 (DeLuca Deposition Exhibit 21 marked.)

21 - - -

22 BY MS. OLIVER:

23 Q. I've handed to you what has been  
24 marked as Exhibit 21.